

Remarks

The applicant has presented the above amendments and the following remarks as a full response to the outstanding Office Action. The applicant respectfully requests the Office's attention to the amendments and arguments presented in this response. The amendments to the claims are supported in the disclosure at least at Figs. 2, 3 (step 330) and 5 (in particular steps 512 and 520) as well as paragraphs [0049] – [0051], [0066] – [0067], and [0097] – [0102] and are offered herein as a good faith effort to clarify and narrow the claimed functionality of the present invention. No amendment offered in this response constitutes the addition of new subject matter. Based on the art that has been cited, the applicant respectfully submits that the present claims are allowable and such action is requested of the Office.

Claim Rejections – 35 USC § 102

The Office has presented a rejection of claims 5-8, 18-21 and 27, each of which are independent, under 35 USC § 102(e) as being anticipated by the United States Patent 7,095,716 B1 to Ke et al (hereinafter Ke). The applicant has reviewed the Ke reference, with particular attention to the citations therein upon which the Office relies, and submits that the subject matter recited in the presently amended claims is not fully anticipated by the teachings of Ke.

The currently amended claims recite methods, and a system, that are used in an access network to the Internet. More specifically, the presently amended claims recite a system and methodology for manipulating original packets that are encapsulated in network based tunnel packets and transferred between a plurality of remote clients (residing on one side of the access network) and a plurality of corporate intranets (residing on the opposite side of the access network), wherein at least two of the remote clients are associated with different corporate intranets. Further, the methods and system recited in the currently amended claims manipulate original packets that are associated with particular corporate intranets in communication with the manipulation system. Importantly therefore, in the currently amended methods claims, only original packets which are directed through the manipulation equipment may be subject to manipulation. Similarly, the currently amended system claim recites the use of a table comprising a list of the plurality of IP based private data networks that are in communication with the manipulation equipment.

With the foregoing framework of the claims in mind, the applicant respectfully submits that Ke does not describe, suggest or teach each and every element recited in the claims. More specifically, the applicant stands forth that the prior art upon which the Office relies at least does not describe, suggest or teach the following elements of the currently amended claims:

- 1) intercepting a plurality of network based tunnels (NBT) carrying data traffic between a plurality of remote clients and a plurality of corporate intranets, wherein at least two of the remote clients are associated with different corporate intranets;
- 2) parsing an original packet and directing it toward the manipulation equipment, and
- 3) manipulating the original packet by sending the original packet through the manipulation equipment.

In general, Ke describes an Internet security device and method that is installed in between a *single user* and the Internet and, as such, at a minimum teaches away from a system and method operable between multiple remote clients in tunneled communication with multiple corporate intranets. Further, Ke teaches at his Fig. 1 and col. 4, lines 2-10 that a single user may be a corporate LAN 125 or a single workstation 115. Importantly, whether Ke specifically refers to a single user, an entire network or a defined user group, he is describing a “one to one” architectural environment and stops well short of describing, suggesting or teaching that his system or methodology may be employed in an environment that must accommodate a plurality of remote clients in tunneled communication with a plurality of corporate intranets.

To be clear, manipulating original packets that are associated with a plurality of corporate intranets (LANs), as is presently claimed, differs entirely from Ke’s teaching which pertains to the handling of original packets associated with a single LAN. An important distinction is that original packets associated with a LAN use private IP addresses and, therefore, original packets from two different LANs may have the same private IP address. Consequently, manipulation equipment that handles original packets that are associated with two different LANs must be capable of handling two original packets having the same private IP address. Nowhere in Ke’s disclosure was the applicant able to find where Ke described, suggested or taught that his system and methodology could accommodate original packets that are received from two different LANs, much less multiple original packets having identical IP addresses. Therefore, as such functionality is now recited in the claims (and supported in the disclosure), the applicant submits that Ke cannot be interpreted to have fully anticipated the subject matter recited in the claims.

Further, the applicant also failed to find any suggestion in Ke that an original packet (i.e., a “plain IP packet”) may be directed toward and through manipulation equipment (i.e., a “processing board”), as is now more clearly recited in the claims. Moreover, Ke actually teaches that an entire NBT packet (i.e., a “VPN packet”) is transferred to the manipulation equipment (i.e., processing board). Such is clearly contrary to that which is presently claimed in which only the original packets, not entire NBT packets, are directed toward and through the manipulation equipment.

Conclusion

The applicant has presented amendments to more specifically clarify the claims in conjunction with arguments that clearly establish that the claims are allowable over the cited reference. For at least the reasons outlined above, the applicant submits that the currently pending claims, namely claims 5-8, 18-21 and 27 are in condition for allowance and respectfully seeks such action from the Office.

If the Office has any questions or if there are any actions that can be handled through an Examiner’s Amendment, the applicant requests the Office to contact the attorney of record using the below-provided contact information.

Respectfully submitted,

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